

**Customer Proprietary Network Information (CPNI)  
Documentation of Operating Procedures  
for  
The Community Agency (TCA)  
102 South Eastern Street  
Sanborn, Iowa 51248**

- TCA has appointed a CPNI Compliance Officer who is responsible for ensuring that the Company is in compliance with all of the CPNI rules. The Compliance Officer will file a Compliance Certification with the FCC by March 1 of each year for data pertaining to the previous calendar year.
- CPNI rules are reviewed on a regular basis with employees. Employees with access to CPNI have been trained on when they are, and are not, authorized to use CPNI.
- TCA has a defined disciplinary process in place for violations and for improper use of CPNI.
- A process that meets the notice requirements of the rules has been developed for notifying customers of their CPNI rights and for requesting approval to use CPNI via the opt-out method.
- Since TCA uses the opt-out method, it provides the CPNI notification to customers every two years. TCA will provide written notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly.
- A field on the customer's account record is noted to clearly show the CPNI approval or denial status for the account.
- TCA retains CPNI notification records for a minimum of one year.
- TCA will not provide CPNI to third parties without the customer's affirmative approval via the opt-in process.
- TCA has established a process for maintaining a record of any marketing campaign of its own or of its affiliates that uses the CPNI of its customers. Specific details of the campaign will be maintained on a spreadsheet and will be retained for a minimum of one year.
- Management must approve all sales and marketing campaigns. TCA has established a supervisory process for any outbound marketing efforts to ensure that supervisory approval has been obtained for any proposed outbound marketing.
- TCA does not disclose any CPNI until the customer has been appropriately authenticated and has a process that is compliant with the rules for providing call-detail information to customers.
- TCA promptly notifies a customer whenever a change is made to the customer's account either by voicemail to the telephone number of record or to the address of record.
- TCA has a process in place for handling breaches which includes notification to the USSS and FBI via the FCC link at <http://www.fcc.gov/eb/cpni>.
- TCA's CPNI policies include reasonable measures to discover and protect against activity that is indicative of pretexting and employees are instructed to notify the CPNI Compliance Officer if any such activity is suspected.

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for: 2008

Date filed: 01/26/2009

Name of company(s) covered by this certification: The Community Agency

Form 499 Filer ID: 821250

Name of signatory: DJ Weber

Title of signatory: General; Manger

I, DJ Weber, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. If the Company obtains any information with respect to the processes pretexters are using to attempt to access CPNI, it will report that information along with what steps the Company is taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed \_\_\_\_\_



Attachment

01/26/2009

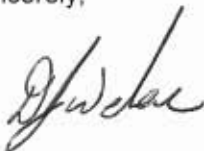
Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, D.C. 20554

RE: EB Docket No. 06-36  
Annual CPNI Certification for Year 2008

Dear Ms. Dortch:

In accordance with Public Notice DA 09-9, issued on January 7, 2009, attached is the annual CPNI certification filing for the year of 2008, pursuant to 47 C.F.R § 64.2009(e), for The Community Agency.

Sincerely,



DJ Weber  
General Manager

Attachment

cc: Best Copy and Printing, Inc.  
445 12<sup>th</sup> Street  
Suite CY-B402  
Washington, D.C. 20554